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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JOSEPH MORGAN, an Individual

Case No.: 2:19-cv-02239-KJD-DJA

Plaintiff.

VS.

STATE OF NEVADA, *ex rel.* its
DEPARTMENT OF BUSINESS AND
INDUSTRY, STATE OF NEVADA, *ex rel.* its
TAXICAB AUTHORITY; BRUCE
BRESLOW, in his individual capacity; TERRY
REYNOLDS, in his individual capacity;
SCOTT WHITTEMORE, in his individual
capacity; RUBEN AQUINO, in his individual
capacity; GENEVIEVE HUDSON, in her
individual capacity; RONALD GROGAN, in
his individual capacity;
CHARLES HARVEY, in his individual
capacity; ANTOINE “CHRIS” RIVERS, in his
individual capacity; CJ MANTHE, in her
individual capacity; DOES I through X
inclusive; and ROES XI through XX, inclusive.

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR PLAINTIFF
TO RESPOND TO DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT
[ECF NO. 76]**

[FIRST REQUEST]

Defendants.

Pursuant to LR IA 6-1, LR 7-2 and LR 26-3, Plaintiff JOSEPH MORGAN (“Plaintiff”), by and through his counsel of record, E. Brent Bryson, Esq. of the law offices of E. Brent Bryson, Ltd., and Defendants STATE OF NEVADA, *ex rel.* its DEPARTMENT OF BUSINESS AND

1 INDUSTRY, STATE OF NEVADA, *ex rel.* its TAXICAB AUTHORITY (together “the Agency
 2 Defendants”) and BRUCE BRESLOW, TERRY REYNOLDS, SCOTT WHITTEMORE, RUBEN
 3 AQUINO, GENEVIEVE HUDSON, RONALD GROGAN, CHARLES HARVEY, ANTOINE
 4 “CHRIS” RIVERS AND C. J. MANTHE (each an “Individual Defendant” and collectively the
 5 “Individual Defendants” and together with the Agency Defendants “the Defendants”), by and
 6 through their attorneys of record, AARON D. FORD, Attorney General for the State of Nevada, and
 7 BRUCE C. YOUNG, Senior Deputy Attorney General:

8 HEREBY STIPULATE AND REQUEST that this Court extend the Wednesday, March 5,
 9 2025 deadline for Plaintiff to respond in opposition to Defendants’ motion for summary judgment
 10 filed on Monday, February 12, 2025 [ECF No. 76] by 30 days, or up to and including Friday, April
 11 4, 2025, and that Defendants’ Reply in support of Defendants’ motion for summary judgment, if any,
 12 would be due 14 days after Plaintiff files his response, or by Friday, April 18, 2025. This is the
 13 parties’ first request to modify the motion for summary judgment briefing schedule.

14 In support of this stipulation and request, the parties state that good cause exists as follows:

- 15 1. That Plaintiff’s attorney is currently preparing for two district court trials set to commence in
 mid-March, 2025. The first trial will commence on March 17, 2025 in case styled, C-24-
 383125-1, The State of Nevada v. Square One Behavioral Health, LLC, and is expected to
 last about a week. The second trial will commence on March 24, 2025 in case styled, A-22-
 850074-C, Jay Francis, et al v. David Garretson, et al, and is expected to last about a week.
 Both trials require extensive trial preparation.
- 21 2. Because of the large volume of discovery, including 9 depositions, Plaintiff’s response in
 opposition will be complicated and time-consuming - an effort that would be hindered if
 Plaintiff’s counsel had to simultaneously prepare for two district court trials.
- 24 3. That as a result, the parties met and conferred telephonically on February 26, 2025 and
 mutually agreed to extend the March 5, 2025 due date of Plaintiff’s response in opposition by
 30 days, or up to and including Friday, April 4, 2025. This modification to the motion for
 summary judgment briefing schedule will allow Plaintiff’s counsel the time needed to
 adequately prepare and respond to Defendants’ motion for summary judgment [ECF No. 76].

1 4. That Defendants' Reply in support of its motion for summary judgment [ECF No. 76] would
 2 therefore also be extended 30 days, or from Wednesday, March 19, 2025, the current due
 3 date, up to and including Friday, April 18, 2025.

4 That based on good cause set forth above, the parties submit the following proposed
 5 modifications to the motion for summary judgment briefing schedule:

Scheduled Event	Current Deadline	Proposed Deadline
Plaintiff's Response in Opposition to Motion for Summary Judgment [ECF No. 76]	<i>Wednesday, March 5, 2025</i>	<i>Friday, April 4, 2025</i>
Defendants' Reply in Support of Motion for Summary Judgment [ECF No. 76], if any.	<i>Wednesday, March 19, 2025</i>	<i>Friday, April 18, 2025</i>

13 This request for an extension of time is not sought for any improper purpose or other
 14 purposes of delay. The parties have worked diligently at complying with the deadlines that can be
 15 met, but good cause exists to extend the current summary judgment briefing schedule.

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Joseph Morgan v. State of Nevada, et al.
Stipulation and Order

WHEREFORE, the parties respectfully request that this Court extend the parties' motion for summary judgment response and reply deadlines as set forth in the table above.

APPROVED AS TO FORM AND CONTENT this 28th day of February, 2025.

By: /s/ E. Brent Bryson, Esq.
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IT IS SO ORDERED:

DATED this 4th day of March, 2025.


KENT J. DAWSON
UNITED STATES JUDGE